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TIME WARNER CABLE LLC
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

12 JAIME CALZADA; MIGUEL
CALZADA; and CHERYL BACA, on
13 behalf of themselves and all others
similarly situated,,
14

Plaintiffs,
15

v.
16

17 TIME WARNER CABLE LLC, a
Delaware Corporation, and DOES 1
through 100, Inclusive,
18

Defendant.
19

No. CV11-01701-MMM (JCGx)

**STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served: February 9, 2011
Current Response Date: March 4, 2011
New Response Date: April 4, 2011

1 It is hereby stipulated and agreed, by and between plaintiffs Jaime Calzada,
2 Miguel Calzada and Cheryl Baca ("Plaintiffs") and defendant Time Warner Cable
3 LLC ("TWC") through their attorneys of record, as follows:

4 RECITALS

5 1. On January 27, 2011, Plaintiffs commenced an action in the Superior
6 Court of the State of California for the County of Los Angeles titled *Jaime*
7 *Calzada; Miguel Calzada and Cheryl Baca v. Time Warner Cable LLC*, Case
8 No. BC 453904 ("Complaint").

9 2. On February 9, 2011, Plaintiffs served the summons and Complaint on
10 TWC.

11 3. On February 25, 2011, TWC filed and served a Notice of Removal,
12 effecting removal of the action to this Court.

13 4. Based on Plaintiffs' service of the summons and Complaint on
14 February 9, 2011, and TWC's removal on February 25, 2011, the current deadline
15 for TWC to respond to the Complaint is March 4, 2011.

16 STIPULATION

17 Pursuant to Central District Local Rule 8-3, all parties stipulate and agree,
18 through their respective attorneys of record, to extend by 30 days the deadline for
19 TWC to move, plead, or otherwise respond to the Complaint to April 4, 2011.

20 Dated: February 28, 2011

DAVID GRIEFINGER

21 By: /s/ David Greifinger

22 David Greifinger

23 Attorneys for Plaintiffs

24 JAIME CALZADA, MIGUEL CALZADA,
and CHERYL BACA

25 Dated: February 28, 2011

WHITE & CASE LLP

26 By: /s/Bryan A. Merryman

27 Bryan A. Merryman

Attorneys for Defendant

28 TIME WARNER CABLE LLC

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 633 W. Fifth Street, Suite 1900, Los Angeles, CA 90071-2007. I am employed by a member of the Bar of this Court at whose direction the service was made.

On February 28, 2011, I served the foregoing document(s) described as **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)** on the person(s) below, as follows:

Kenneth M. Lipton, Esq.
5900 Sepulveda Blvd., Suite 400
Van Nuys, CA 91411
Phone: (818) 780-2580

Attorneys for Plaintiff

☒ **(BY MAIL)** I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed above and placed the envelope for collection and mailing at 633 W. Fifth St., Suite 1900, Los Angeles, California, following our ordinary business practices. I am readily familiar with the firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

Executed on February 28, 2011, at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

/s/Charlene Ephraim
Charlene Ephraim